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BEFORE THE IOWA DEPARTMENT OF WATER, AIR AND WASTE MANAGEMENT DES MOINES, IOWA

IN THE MATTER OF: Sheller-Globe Corp. Keokuk Division 3200 Main St. Keokuk, Iowa 52632

ADMINISTRATIVE ORDER NO. 84-LQ-01

TO: Mr. Roger L. Bertraw
Division General Manager
Sheller-Globe Corporation
3200 Main St.
Keokuk, Iowa 52632

C.T. Corporation System Registered Agent 1980 Financial Center Des Moines, Iowa 50311

Pursuant to Iowa Code section 455B.418 (1983), you are hereby notified that the Executive Director of the Department of Water, Air and Waste Management (hereinafter the "Department") has evidence that:

- 1. The Sheller-Globe Corporation (hereinafter "Sheller-Globe") is a Ohio Corporation which is qualified to do business in Iowa. Its registered agent is C.T. Corporation System, 1980 Financial Center, Des Moines, Iowa 50311.
- 2. Sheller-Globe, a manufacturing facility located in Keokuk, Iowa, manufactures crash pads and rubber weatherstripping for the automotive industry.
- 3. On November 20, 1980, Sheller-Globe submitted to the Department a Part A Application for a Hazardous Waste Permit for a storage facility. As a part of this

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application, Sheller-Globe notified the Department that it generated two hazardous waste mixtures, each containing six hazardous constituents. The annual quantity of these wastes totaled 90,000 lbs.

- 4. On August 9, 1982, this storage facility was inspected by the Department. The violations noted during the course of this inspection included improper labeling of containers, storage of waste in excess of specified storage capacity, and storage of damaged containers.
- 5. On August 29, 1982, another inspection was conducted during which progress in correcting the violations was noted. Further progress was noted on November 3, 1982.
- 6. On January 11, 1983, 325 barrels were observed in the storage area, the majority of these containing paint solids, paint solvents and methylene chloride. In response to this inspection, Sheller-Globe continued the process of identifying its stored waste and disposing of portions of that waste.
- 7. On May 9, 1983, Region VII of the EPA notified Sheller-Globe of its review of the Part A permit application submitted by Sheller-Globe. By this letter EPA notified Sheller-Globe that it was to amend its Part A application to, in part, reflect changes in its waste

listings, and to define the boundaries of its past, present and future storage, treatment and disposal areas.

- 8. On June 27, 1983, during the course of a Department inspection, Sheller-Globe was once more advised of violations of storage requirements of 40 C.F.R. 265, Subpart I, adopted by reference by rule 900--141.6 (455B) Iowa Administrative Code (IAC). Sheller-Globe was advised that failure to properly identify stored wastes, and improper management of the storage facility were violations of the Department's rules and were to be corrected.
- 9. On July 20, 1983, Sheller-Globe submitted a revised Part A hazardous waste permit application thereby amending its application to allow for the storage of one more hazardous waste and to allow treatment of one waste stream.
- 10. On July 29, 1983, in a letter to the Department, Sheller-Globe agreed to take a number of actions to correct the deficiencies in its hazardous waste handling program. These actions included the discontinuation of co-storage of hazardous and non-hazardous waste by September 1, 1983.
- 11. Subsequent inspections on August 18, 1983, and September 14, 1983 revealed continued co-storage of wastes and violations of storage requirements including the failure to properly mark wastes and storage in leaking uncovered containers.

- 12. On Jamary 4, 1984, during the correction of the RCRA storage requirements were noted. Once more co-storage and storage in excess of the facility's storage capacity of 200 55-gallon drums was observed.
- 13. This facility is currently storing 588 55-gallon drums in its storage area.

Therefore, the Sheller-Globe Corporation is hereby ordered to comply with the following, immediately:

- 1. Clearly identify all wastes now stored in the waste storage area by properly cataloging all waste containers in accordance with 40 C.F.R. §265.73, &s adopted by rule 900--141.6 (IAC).
- 2. Reduce the number of containers stored in the storage area to the design capacity limit of 200. If the design capacity is to be increased an amended Part A must be submitted and approved prior to any actual increase.
- 3. Remove all containers which are currently leaking to a permitted hazardous waste disposal site and clean all spills which have occurred in the storage area, containerize the spilled material and dispose of it at a permitted hazardous waste facility.
- 4. Pursuant to 40 C.F.R. §§265.73 adopted by the Department by 900--141.6 (455B) (IAC), prepare and maintain an operating record which includes waste analysis results, an inspection log and the description and location of hazardous waste within the facility.
- 5. Pursuant to 40 C.F.R. §265.16(d)(2) as adopted by 900--141.6 (455B) (IAC) provide a written job description for each position at the facility related

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to hazardous ste management. This description must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.

In accordance with the provisions of Iowa Code Section 455B.418(1)(a) you may appeal this order by filing a written notice of appeal with the executive director within 30 days. If this order is not appealed and you refuse to comply with its provisions the executive director has the authority to refer this matter to the Attorney General who will institute any legal proceedings necessary to obtain compliance; pursuant to Iowa Code section 455B.418(2).

Any questions regarding this Order may be directed to:

Mark Landa Compliance Officer Department of Water, Air and Waste Management Henry A. Wallace Building 900 E. Grand Des Moines, Iowa 50319

Dated this day of

Stephen W.

Executive Director of the Department of Water, Air

and Waste Management